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Federal Communications Commission  
Office of Secretary

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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In the Matter of )

Amendment of Section 73.202(b) )

Table of Allotments )

FM Broadcast Stations )

(Wray and Otis, Colorado) )

MM Docket No. 97-117

RM 9009

COMMENTS by the petitioner, New Directions Media, Inc., concerning  
MM Docket No. 97-117, RM 9009, Notice of Proposed Rule  
Making, adopted April 9, 1997.

1. The petitioner incorporates by reference its previous pleadings in the Petition to Amend 73.202(b) dated January 21, 1997.
2. The petitioner re-states its intention to apply for Channel 252C1 if it is re-allotted from Wray to Otis, Colorado, and, when authorized, to build the station promptly.
3. The petitioner advises the Commission that:
  - A. The assignment of KRDZ-AM (see footnote #5 in the Notice of Proposed Rule Making) was granted and then consummated on April 1, 1997.
  - B. The Petition for Rule Making mentioned in the same footnote has resulted in a Notice of Proposed Rule Making, RM-9018, to allot Channel 237C1 to Eckley, Colorado, for which the petitioner, KRDZ Broadcasters, Inc., has re-stated its intention to apply and operate in conjunction with KRDZ-AM, Wray, Colorado, 12 miles east of Eckley, thereby providing Wray with its second full time service.
  - C. Another full time service to Wray is possible in the near future should the FCC grant a permit for vacant Channel 222 at Holyoke, Colorado, a distance of approximately 34 miles north of Wray. An application was filed earlier for the this channel in the Spring of 1997. If granted this station would likely provide a third full time service to Wray.
4. In Item 4 of the Notice of Proposed Rule Making the Commission requested petitioner to provide additional data relative to "gain" and "loss" areas if 252C2 was re-allotted from Wray to Otis as a C1 service, and to provide information about reception services that are available in gain and loss areas. Petitioner submits the following for Commission consideration:

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A. Lost if KATR-FM, Channel 252C2 is re-allotted from Wray to Otis.

| Cities/Population |             | Counties/Population |             |
|-------------------|-------------|---------------------|-------------|
| Wray              | 1998        | Yuma (75%)          | 6716        |
| Holyoke           | 1931        | Phillips (40%)      | 1676        |
| Laird             | 100 *       | Washington (10%)    | 481         |
| Vernon            | 100 *       |                     |             |
|                   | <u>4129</u> |                     | <u>8873</u> |

\* not listed by Rand-McNally, estimated by petitioner at 100 or less. Population figures 1990 or estimates.

B. Gained if KATR-FM, Channel 252C1 is re-allotted to Otis.

|          |              |                  |              |
|----------|--------------|------------------|--------------|
| Akron    | 1599         | Logan (80%)      | 14054        |
| Atwood   | 100          | Morgan (33%)     | 7306         |
| Brush    | 4165         | Phillips (50%)   | 2095         |
| Crook    | 100          | Yuma (35%)       | 3134         |
| Fleming  | 344          | Washington (60%) | 2887         |
| Haxtun   | 952          |                  |              |
| Hillrose | 100          |                  |              |
| Merino   | 238          |                  |              |
| OTIS     | 451          |                  |              |
| Padroni  | 100          |                  |              |
| Platner  | 100          |                  |              |
| Proctor  | 100          |                  |              |
| Snyder   | 100          |                  |              |
| Sterling | 10362        |                  |              |
| Stoneham | 100          |                  |              |
|          | <u>18911</u> |                  | <u>29476</u> |

\* as in A above applies to towns of less than 100

Above assumes proposed KATR-FM, Channel 252C1, at 100KW ERP, 500' HAAT Antenna and located approximately 15 miles north of Otis.

And, existing KATR-FM, Channel 252C2, at 50KW ERP, 278' HAAT Antenna, located approximately 17 miles northwest of Wray, Colorado.

C. Principal cities/towns and population within them in the proposed and existing 3.16 mV/m City Grade signal area:

| Proposed (Otis) 15713 persons |       | Existing (Wray) 4928 persons |      |
|-------------------------------|-------|------------------------------|------|
| Akron                         | 1599  | Eckley                       | 211  |
| Fleming                       | 344   | Wray                         | 1998 |
| Merino                        | 238   | Yuma                         | 2719 |
| Otis                          | 451   |                              |      |
| Sterling                      | 10362 |                              |      |
| Yuma                          | 2719  |                              |      |

D. Reception Services available:

Gain Area (Proposed, Otis)

KATR-FM Full Time (if Ch252C1  
is allotted)

KNNG-FM Full Time via 1 mV/m

KSIR-AM Day Time via 5 mV/m

Loss Area (Existing, Wray)

KRDZ-AM Full Time via 5 mV/m  
day and nite protected

KLOE-AM Day Time via 5 mV/m

Pending Channel 222C2 upon  
grant at Holyoke, CO

If allotted Ch237C1 (RM-9018)  
for full time service  
to Wray from Eckley, CO  
via 3.16 mV/m signal

5. The Commission has found that 252C1 can be reallocated to Otis from Wray, and 237C1 can be allotted to Eckley as its first allocation which would provide a City Grade signal to Wray and Yuma as well as to Eckley.

KATR-FM if allocated to Otis would provide 1 mV/m service to nearly three times as many residents compared to its present location near Wray./1/

KATR-FM if allocated to Otis would provide City Grade, 3.16 mV/m, service to over 15,000 residents compared to its present location with less than 5,000 persons.

Reallocating KATR-FM to Otis from Wray would still leave Wray with full time service from KRDZ-AM and KLOE-AM during the day time, plus two more full time FM services in the near future.

I, Robert D. Zellmer, President of New Directions Media, Inc. do state that the information contained in these comments was prepared by me and are true and correct to best of my knowledge and belief,

Robert D. Zellmer.

Sworn before me this 2nd day of June, 1997, Marion M. Zellmer,  
Notary Public in the State of Colorado, at 822 7th Street, Suite 740,  
P.O. Box 2475, Greeley, Colorado, 80631.

My Commission Expires May 18, 1998

- /1/ KATR-FM if allocated to Otis would provide a first local aural service for Washington County, Colorado, which has no local radio station at this time. The two principal cities in said county are Otis, population 451, and Akron, population 1599.